

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

JUDICIAL WATCH, INC., and  
TRUE THE VOTE,

*Plaintiffs,*

v.

J. BRADLEY KING, TRENT DECKARD,  
and CONNIE LAWSON, in their official  
capacities,

*Defendants.*

Case No. 1:12-cv-800-WTL-TAB

**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Plaintiffs Judicial Watch and True the Vote respectfully move the Court for summary judgment pursuant to Fed. R. Civ. P. 56 and S.D. Ind. Local Rule 56-1.

As shown in Plaintiffs' Brief and Statement of Material Facts Not in Dispute filed simultaneously herewith, Defendants have violated Section 8 of the National Voter Registration Act. 42 U.S.C. § 1973gg-6. Plaintiffs are therefore entitled to judgment as a matter of law on all counts of their Complaint.

Accordingly, Plaintiffs respectfully request that the Court enter an Order:

- Granting summary judgment for Plaintiffs on all claims;
- Awarding declaratory and injunctive relief to Plaintiffs;
- Awarding any other relief that the Court deems just and proper.

Dated: October 11, 2013

Respectfully submitted,

J. Christian Adams  
*Of Counsel*

ELECTION LAW CENTER, PLLC  
300 N. Washington Street, Ste. 405  
Alexandria, VA 22314

David R. Langdon  
Joshua B. Bolinger

LANGDON LAW LLC  
8913 Cincinnati-Dayton Rd.  
West Chester, Ohio 45069  
Tel: (513) 577-7380  
Fax: (513) 577-7383  
Email: dlangdon@langdonlaw.com  
jbolinger@langdonlaw.com

/s/ Paul J. Orfanedes  
Paul J. Orfanedes

/s/ Chris Fedeli  
Chris Fedeli

Admitted *Pro Hac Vice*

JUDICIAL WATCH, INC.  
425 Third Street S.W., Ste. 800  
Washington, DC 20024  
Tel: (202) 646-5172  
Fax: (202) 646-5199  
Email: porfanedes@judicialwatch.org  
cfedeli@judicialwatch.org

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day of October, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Chris Fedeli

Chris Fedeli